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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Amendment of Section 73.606(b)) MM Docket No.
Table of Allotments) RM -
Television Broadcast Stations)
(Elk City, Oklahoma and Borger, Texas))

To: Chief, Allocations Branch
Policy & Rules Division
Mass Media Bureau

REQUEST FOR EXPEDITED CONSIDERATION

TV 31, L.L.C. ("TV 31"), permittee of UHF TV Station KBCA, Channel 31 at Elk City, Oklahoma, by its counsel, respectfully requests expedited consideration of its Petition for Rule Making ("Petition"), filed on March 24, 1999, seeking amendment of the Commission's Table of Television Allotments, 47 C.F.R. § 73.606(b), to delete UHF TV Channel 31 at Elk City, Oklahoma allot UHF TV Channel 31 to Borger, Texas instead, and modify Petitioner's permit for Station KBCA to reflect this reallocation. TV 31's permit is scheduled to expire on December 19, 2000. Unless the Commission acts on an expedited basis, TV 31 would either forfeit the permit or abandon the Borger proposal. In support thereof, TV 31 submits the following:

1. On December 19, 1997, the Commission issued TV 31 a construction permit to build a new NTSC UHF television station on Channel 31 at Elk City, Oklahoma, FCC File No. BPCT-960919KP. On March 24, 1999, TV 31 petitioned the Commission to change the Table of Television

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Allotments by deleting Channel 31 at Elk City, Oklahoma and adding Channel 31 at Borger, Texas.¹ TV 31 supported its request with substantial evidence that the proposed reallocation would promote the public interest, convenience, and necessity, *inter alia*, by providing Borger with its first local television service. Although a Notice of Proposed Rule Making is often issued within a few months of receipt, no such Notice was forthcoming.

2. In July 1999, counsel for TV 31 contacted Commission staff to identify the cause of the delay and was told that the Petition required an evaluation of the potential impact of the proposed reallocation on existing digital television (“DTV”) allotments. Commission staff further indicated that they were unable to conduct the necessary evaluation with the computer programs available at that time. Accordingly, TV 31 submitted a Supplement to its Petition for Rule Making on July 23, 1999 (“Supplement”),² which included a technical exhibit demonstrating that the proposed reallocation would not adversely impact any DTV allotments.

3. In September 1999, the Commission issued its initial Notice of Proposed Rule Making in MM Docket No. 99-292, Establishment of a Class A Television Service. Shortly thereafter, Congress passed the Community Broadcasters Protection Act of 1999 (“CBPA”), which also addressed the creation of a Class A LPTV service. This legislation superceded the Commission’s pending Class A LPTV efforts at that time, and thus the Commission terminated its initial proceeding and issued a second NPRM to carry out the CBPA’s directives.

4. TV 31’s recognizes that its Petition is affected by these Class A LPTV proceedings because of the presence of LPTV Station K31ET, Amarillo, Texas. Under the proposed Class A

1. A copy of the Petition is attached as Exhibit A.

2. A copy of the Supplement is attached as Exhibit B.

rules, upgrading K31ET to Class A status would preclude the Commission from granting TV 31's reallocation proposal. K31ET has in fact submitted a certification of eligibility with the Commission, indicating its intent to apply for Class A status when possible.

5. On February 10, 2000, TV 31 filed comments in the Commission's Class A LPTV proceeding, MM Docket Nos. 00-10, 99-292.³ In those comments, TV 31 endorsed the Commission's proposed interpretation of the Community Broadcasters Protection Act of 1999 to require that Class A LPTV stations protect allotment proposals for technical changes in authorized facilities, so long as the proposal in question was filed with the Commission prior to November 29, 1999. TV 31 contended that such an interpretation would avoid the injustice of penalizing petitioners for delays in the processing of rule making petitions that occurred through no fault of their own, and would promote the public interest goals of Section 307(b) of the Communications Act of 1934.

6. Because nearly eleven months have passed since TV 31 first filed its Petition for Rule Making, TV 31 requests that the Commission take immediate steps to accelerate action on the Petition. To that end, TV 31 asks that the Commission issue a Notice of Proposed Rule Making on the Petition as soon as possible, without waiting for the conclusion of the Class A LPTV proceeding. The Notice can state that final action must await the outcome of Dockets 00-10, 99-292.

7. TV 31 is faced with an unfair dilemma. If it constructs at Elk City, it may not be able to relocate to Borger due to the Commission's policy against depriving a community of its only local service. However, if it waits it may not receive action before its permit is automatically forfeited at the end of this year even though Borger is the preferred community under the Commission's allotment priorities.

3. A copy of these Comments is attached as Exhibit C.

In light of the foregoing, TV 31 respectfully requests that the Commission issue a Notice of Proposed Rule Making based on the Petition for Rule Making filed by TV 31 on March 24, 1999.

Respectfully submitted,

TV 31, L.L.C.

By:



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February 17, 2000

Exhibit A

STAMP & RETURN

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Amendment of Section 73.606(b))
Table of Allotments)
Television Broadcast Stations)
(Elk City, Oklahoma and Borger, Texas))

MM Docket No.
RM -

RECEIVED
MAR 24 1999
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

To: Chief, Allocations Branch
Policy & Rules Division
Mass Media Bureau

PETITION FOR RULE MAKING

TV 31, L.L.C. ("Petitioner"), permittee of UHF TV Station KBCA, Channel 31 at Elk City, Oklahoma, by its counsel, hereby petitions the Commission, pursuant to Section 1.420 of the Commission's Rules, for amendment of the Commission's Table of Television Allotments (Section 73.606(b) of the Commission's Rules) to delete UHF TV Channel 31 at Elk City, Oklahoma and allot UHF TV Channel 31 to Borger, Texas, and modify Petitioner's permit for Station KBCA accordingly. Grant of this petition will provide the community of Borger, Texas with its first local television service. Elk City currently has a noncommercial educational television allotment (Channel 15*).¹ In support hereof, Petitioner states as follows:

1. The Commission's obligation under Section 307(b) of the Communications Act of 1934, as amended, (the "Act") is to provide a "fair, efficient and equitable distribution of radio service" to the various cities and communities across the country. The priorities for distributing television stations equitably across the country are:

-
1. In addition, there are additional channels available for NTSC or DTV allotment to Elk City. See attached Technical Exhibit, p. 2.

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P. 11-11

(1) to provide at least one television service to all parts of the United States, (2) to provide each community with at least one television broadcast station, (3) to provide a choice of at least two television services to all parts of the United States, (4) to provide each community with at least two television broadcast stations, and (5) to assign any remaining channels to communities based on population, geographic location, and the number of television services available to the community from stations located in other communities.

Sixth Report and Order, 41 FCC 148, 167 (1952) (“Television Allocation Priority Policy”).

2. Under the Commission’s decision in *Modification of FM and TV Authorizations to Specify a New Community of License*, 4 FCC Rcd 4870 (1989), *recon.*, 5 FCC Rcd 7094 (1990), petitions for rule making to change community of license will not be granted if the effect would be to deprive a community of its only local transmission service. KBCA has not been constructed, and has not at any time provided local service to the residents of Elk City. Therefore, the reallocation of Channel 31 from Elk City to Borger will not deprive Elk City of a local transmission service. See, e.g., *Farmington and Gallup, NM*, 11 FCC Rcd 2357, 2360 (1996). The community of Elk City will still have a local television allotment (Channel 15*) if Petitioner’s proposal is adopted and Channel 31 is reallocated to Borger, Texas.²

3. Borger fully satisfies the FCC definition of “community” for allotment purposes. Borger had a population of 15,675 according to the 1990 U.S. Census. There is a mayor/city council form of government and a city manager. Borger has its own post office and zip codes (79007 and 79008). Borger has its own police department and fire protection, a hospital, and a branch of the

2. An analysis of DTV service is not necessary as this Petition affects only the NTSC Television Table of Allotments. Petitioner did not qualify for a pre-designated DTV allotment, as the construction permit was not issued before the cut-off date established in the Commission’s *Sixth Report and Order on Digital Television Service*, 12 FCC Rcd 14588, 14593 (1997). Accordingly, Petitioner is not seeking in this Petition the allotment of a DTV channel for Borger.

Hutchinson County Library is located in Borger. Borger has its own local newspaper, the *Borger News Herald*. It also has its own school district, the Borger Independent School District, and is the home of Frank Phillips College. Borger has its own Chamber of Commerce and more than 35 churches. Other civic and community groups in Borger include Rotary Club, Lions Club and the United Way. See Exhibit A.

4. There are dozens of businesses located in Borger and some of the major employers within Borger are: Phillips Petroleum Company, Borger ISD, Golden Plains Community Hospital, Wal-Mart and K-Mart. See Exhibit A. Borger was designated as a Primary Business Center by Rand McNally in 1995. See *Rand McNally Commercial Atlas and Marketing Guide*, 1995 Edition.³

5. Borger is not located in an urbanized area and the proposed principal community contour will not cover 50% of an urbanized area.

TECHNICAL ANALYSIS

6. The attached Technical Exhibit includes an area-to-locate map which shows that the proposed site for the Borger, Texas allotment on Channel 31 meets all applicable FCC spacing requirements, and will provide city grade coverage to Borger. The attached Technical Exhibit also includes a separation study which shows that the proposed site meets the minimum separation requirements for all NTSC allotments contained in Section 73.606(b) of the Commission's Rules and the DTV allotments contained in Section 73.622(b) of the Commission's Rules. In addition, the channel study demonstrates that the proposed allotment of Channel 31 to Borger, Texas is mutually exclusive to the current allotment of Channel 31 at Elk City, Oklahoma. Should Channel

3. A Principal Business Center is defined as a city of major economic importance including but not limited to, Basic Trading Centers or Major Trading Centers.

31 be reallocated to Borger, Petitioner will file an application to specify the new community of license.

7. The reallocation of Channel 31 to Borger will provide first television service (“white area”) to 10,268 people within a 3,772 square kilometer area and second television service (“gray area”) to 5,601 people in a 4,791 square kilometer area. Deleting the Channel 31 allotment from Elk City (1990 U.S. Census population - 10,428) will result in 49,453 people in a 12,277 square kilometer area losing their second television service, albeit a service that they have not come to rely on since the Channel 31 facility in Elk City has not been constructed. See, *Farmington, supra*.

8. The reallocation of Channel 31 from Elk City to Borger advances Priority 1 of the Commission’s Television Allocation Priority Policy. It will provide a “white” area gain (Priority 1) of 10,268 people in a 3,772 square kilometer area, and Priority 3, a first local service to a larger community (15,675 population for Borger vs. 10,428 for Elk City). Retention of the Channel 31 allotment at Elk City advances only Priorities 2 and 3 (“gray” area service and first local television service). Because the reallocation of Channel 31 will provide service to a “white area,” it is clearly preferred over retaining the Channel 31 allotment at Elk City. See, e.g., *Littlefield, Wolfforth and Tahoka, TX*, 12 FCC Rcd 3216, 3220 (1997).

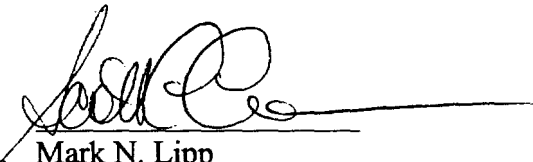
9. The deletion of Channel 31 at Elk City will result in a net loss of Grade B service to a population of 74,223 people within a 15,880 square kilometer area. The reallocation of Channel 31 to Borger will provide a net gain in new Grade B service to a population of 77,402 people in a 20,056 square kilometer area, resulting in a net Grade B service gain of 3,179 people in a 4,176 square kilometer area.

CONCLUSION

Accordingly, Petitioner respectfully requests that the Commission grant the instant Petition and amend the Table of NTSC Television Allotments (Section 73.606(b) of the Commission's Rules) to delete Channel 31 at Elk City, Oklahoma, allot Channel 31 to Borger, Texas and amend Petitioner's construction permit to provide Borger with a first local service.

Respectfully submitted,

TV 31, L.L.C.

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Its Counsel

March 24, 1999

TECHNICAL EXHIBIT
IN SUPPORT OF
A PETITION FOR RULE MAKING
TO AMEND THE NTSC TV TABLE OF ALLOTMENTS
ELK CITY, OKLAHOMA AND BORGER, TEXAS

Technical Narrative

This technical narrative and associated exhibits have been prepared on behalf of NTSC TV station KBCA (herein "Petitioner") in support of a Petition for Rule Making to amend Section 73.606(b) by the reallocation of NTSC channel 31 from Elk City, Oklahoma to Borger, Texas and the modification of the construction permit of KBCA on NTSC channel 31 at Elk City, accordingly (BPCT-960919KP). As the requested change to NTSC channel 31 at Borger is mutually exclusive with the present allotment of NTSC channel 31 at Elk City, Petitioner invokes the provisions of Section 1.420(i).

The following is a summary of the reallocation proposal:

- The community of Borger, Texas (1990 population 15,675) will be provided with its first local NTSC television transmission facility.
- Elk City, Oklahoma (1990 population 10,428) will not be deprived of its sole local NTSC service as station KBCA is an unconstructed station and not a service upon which the public has come to rely on. Furthermore, noncommercial educational television NTSC channel 15 is currently allotted to Elk City.
- Borger is not located within any Urbanized Area as defined by the 1990 U.S. Census.
- The number of persons within the KBCA Grade B contour will increase from 79,276 persons to 82,455 persons, and there will be a "net" increase in Grade B coverage to 3,179 persons.
- The proposal will not impact the present DTV allotment table.

- The proposal will result in service to a white area containing 10,268 persons within 3,772 square kilometers.
- Several additional NTSC channels are available for allotment to Elk City.

Proposed Change in NTSC Table of Allotments

Station KBCA is currently authorized (BPCT-960919KP) to operate on NTSC channel 31 at Elk City, Oklahoma. Elk City is located in Beckham County, Oklahoma and has a 1990 U.S. Census population of 10,428 persons. Station KBCA is an unconstructed NTSC station and not a service upon which the public has come to rely on. Therefore, adoption of the proposal will not deprive Elk City of its sole "existing" local NTSC television transmission service.¹ Furthermore, noncommercial educational NTSC channel 15 is currently allotted to Elk City.²

Borger, Texas is also located in Hutchinson County and has a 1990 U.S. Census population of 15,675 persons. Borger has no local NTSC television transmission service and, therefore, Petitioner's proposal would bring first local NTSC television transmission service to Borger.

<u>City</u>	<u>Present</u>	<u>Proposed</u>
Elk City, Oklahoma	*15, 31	*15
Borger, Texas	--	31

¹ See paragraph 19 of the **Report and Order** in MM Docket No. 92-81 (Farmington and Gallup, New Mexico, DA 96-128) adopted February 1, 1996 and released February 23, 1996.

² Several channels are also available for either NTSC or DTV use at Elk City, including 38, 41, 44 and 47.

Compliance With FCC Rules

The attached Figure 1 is a tabulation of required separations pertinent to the use of NTSC channel 31 at Borger. The reference site (located in TV Zone II) complies with the Commission's minimum distance separation requirements contained in Sections 73.610 and 73.698 to all existing, authorized and proposed NTSC stations and allotments as shown on Sheet 1 of Figure 1. In addition, the reference site complies with the Commission's minimum distance separation requirements contained in Section 73.623(d) to all existing, authorized and proposed DTV stations and allotments as shown on Sheet 2 of Figure 1.³ Operation from the reference site will provide the requisite city grade signal to all of Borger based on an effective radiated power (ERP) of 5000 kW and an antenna height above average terrain (HAAT) of 300 meters. Maximum UHF NTSC facilities for stations located in Zone II are an ERP of 5000 kW and an HAAT of 609 meters.

Figure 2 is a map showing the area to locate for NTSC channel 31 at Borger in compliance with the Commission's minimum distance separation requirements and city coverage requirements based on an ERP of 5000 kW and an HAAT of 300 meters.

Pursuant to Section 1.420(i), the Commission will consider petitions to modify the license/construction permit of an TV station to specify a new community if the proposed allotment would be mutually exclusive with the present assignment. As the entire area to locate for NTSC channel 31 at Borger depicted on Figure 2 would be short-

³ Although the separations contained in Section 73.623(d) are applicable to DTV allotments not included in the initial DTV Table, it is believed that these separations are also applicable for NTSC reallocation proposals.

spaced to the authorized KBCA channel 31 operation, the new allotment is mutually exclusive with the existing allotment.

Finally, as the construction permit for station KBCA was issued after the cut-off date established by the Commission in the **Sixth Report and Order on Digital Television Service**, it did not qualify for a pre-designated DTV allotment. Therefore, petitioner is not requesting a paired DTV allotment for Borger.

Urbanized Area Consideration

Borger, Texas is not located within any Urbanized Area as defined by the 1990 U.S. Census.

Grade B Gain and Loss Areas and Available Services

Figure 3, attached, is a map showing the NTSC TV Grade B contours for the authorized KBCA operation on NTSC channel 31 at Elk City and the proposed KBCA operation on NTSC channel 31 at Borger. Authorized facilities (ERP 5000 kW/HAAT 217 m) were used to determine the location of KBCA's authorized Elk City Grade B contour and presumed facilities (ERP 5000 kW/HAAT 300 meters) were used to determine the location the proposed Borger Grade B contour. The Grade B "gain" and "loss" areas are also indicated.

Figure 4 is a map depicting the Grade B contours for the authorized and proposed KBCA operations. Also shown are the other Grade B services available to the areas within the KBCA authorized and proposed Grade B contours. Figure 5 tabulates the TV stations whose Grade B contours are shown on Figure 4.

Figure 6 is a tabulation of the land areas and estimated populations within the KBCA authorized and proposed Grade B contours. Also tabulated are the gain, loss and "net" gain areas and the results of the other available Grade B services for these areas. Adoption of the Petitioner's proposal will increase the number of persons within the KBCA Grade B contour from 79,276 persons to 82,455 persons, and will result in a "net" increase in Grade B coverage to 3,179 persons. In addition, adoption of the proposal will result in service to a TV white area (0 existing services) containing 10,268 persons within 3,772 square kilometers.

TV Grade B Coverage Contours

The TV predicted Grade B coverage contours were calculated in accordance with the provisions of Section 73.684.


Population and Area

The population within each TV Grade B contour and each gain and loss area was calculated using a computer program that utilizes the 1990 U.S. Census database of "population centroids". The program adds the populations of those U.S. Census designated areas whose centroid was within each service area. The area within each TV Grade B contour was calculated using a root mean square algorithm.

Conclusion

NTSC Channel 31 can be reallocated from Elk City, Oklahoma to Borger, Texas in compliance with all applicable Commission Rules. The proposal will result in

a first local NTSC television transmission service to Borger. The proposal would not deprive Elk City of local NTSC television transmission service. The number of persons within the KBCA Grade B contour will increase from 79,276 persons to 82,455 persons, and there will be a "net" increase Grade B coverage to 3,179 persons. In addition, adoption of the proposal will result in service to a TV white area (0 existing services) containing 10,268 persons within 3,772 square kilometers. Therefore, Petitioner requests the reallocation of channel 31 from Elk City to Borger and the modification of the Petitioner's construction permit to specify operation on channel 31 at Borger.



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March 22, 1999

TECHNICAL EXHIBIT
IN SUPPORT OF
A PETITION FOR RULE MAKING
TO AMEND THE NTSC TV TABLE OF ALLOTMENTS
ELK CITY, OKLAHOMA AND BORGER, TEXAS

NTSC to NTSC Separation Study

[illegible]

Call Status	City St	FCC File No.	Channel Zone	ERP(kW) HAAT(m)	Latitude Longitude	Bear. True	Dist. (km)	Req. (km)
ALLOC.	GUYMON	-	*16(o) II	0	36-40-12 101-28-47	334.2	120.00 0.10	119.9 CLOSE
ALLOC.	WOODWARD	-	*17(-) II	0	36-26-10 99-23-23	58.3	158.21 62.51	95.7 CLEAR
KBCA CP	ELK CITY	BPCT-960919KP	31(o) II	5000 217	35-24-22 99-29-54	104.1	130.55 -150.25	280.8 SHORT ¹

** End of TV Separation Study for Channel 31 **

NTSC to DTV Separation Study

[illegible]

Call	City	Channel	ERP(kW)	Latitude	Bear.	Dist.	Req.
Status	St	FCC File No.	Zone	HAAT(m)	Longitude	True (km)	(km)
DKVIITV	AMARILLO	23	631.8	35-22-29	248.4	96.72	24.1/96.6
DTVALT	TX	II	518	101-52-58		0.12	CLOSE
D	GUYMON	29		36-40-12	334.2	119.99	24.1/96.6
DTVALT	OK	II		101-28-47		23.39	CLEAR

** End of DTV Separation Study for Channel 31 **

¹ Authorized KBCA Site. Requested reallocation of NTSC channel 31 to Borger, Texas is mutually exclusive with the Petitioner's current channel 31 allotment at Elk City, Oklahoma.

Figure 2

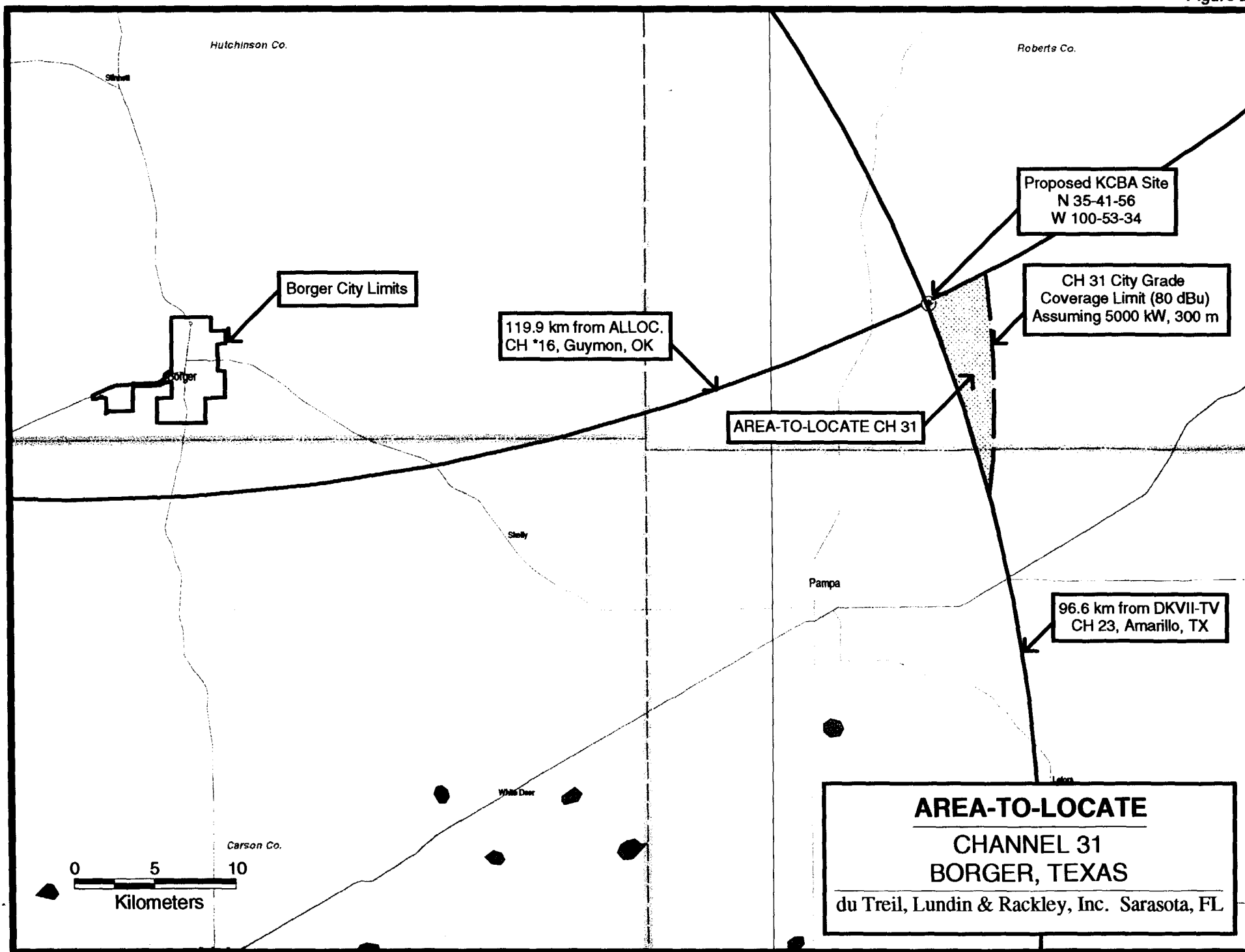


Figure 3

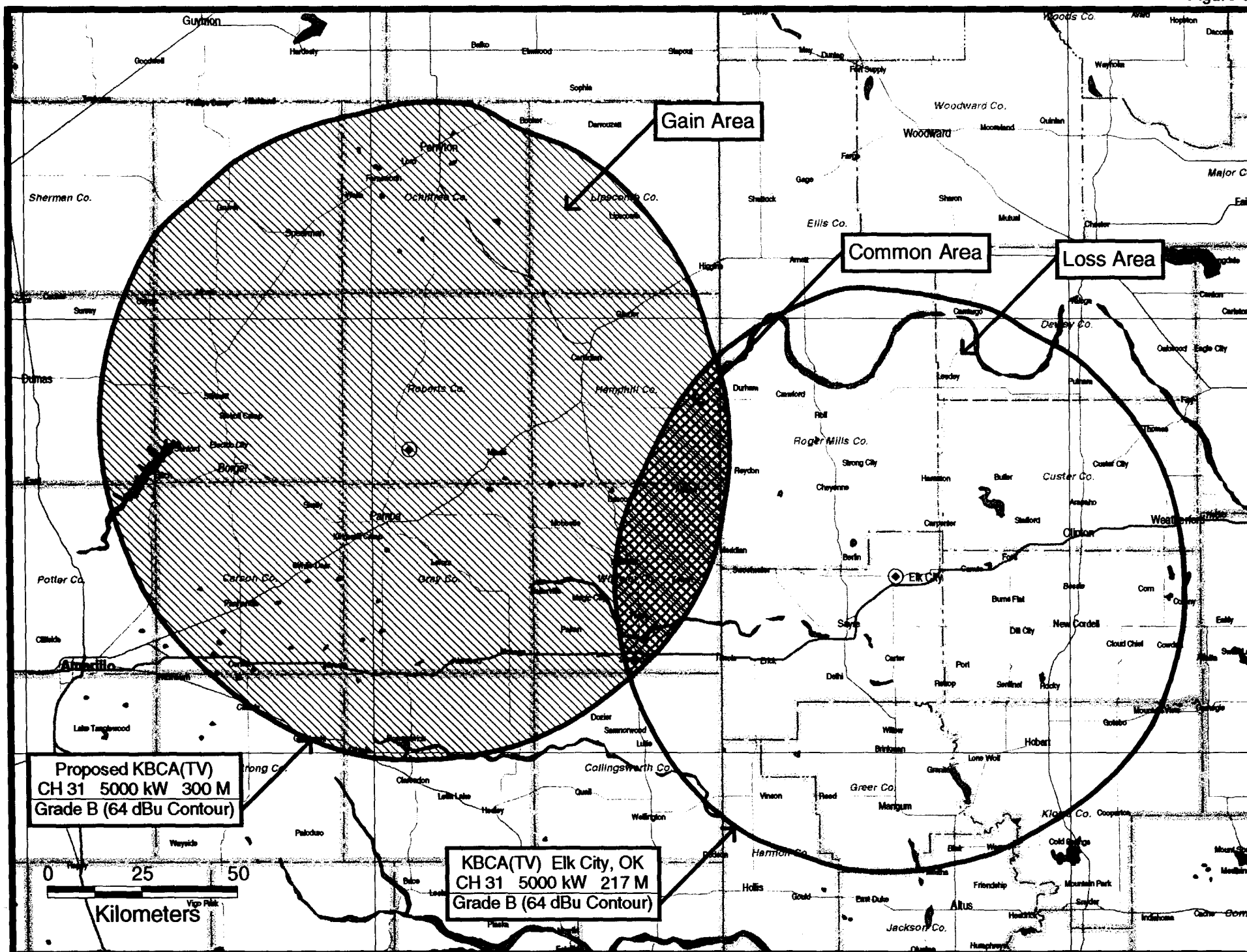
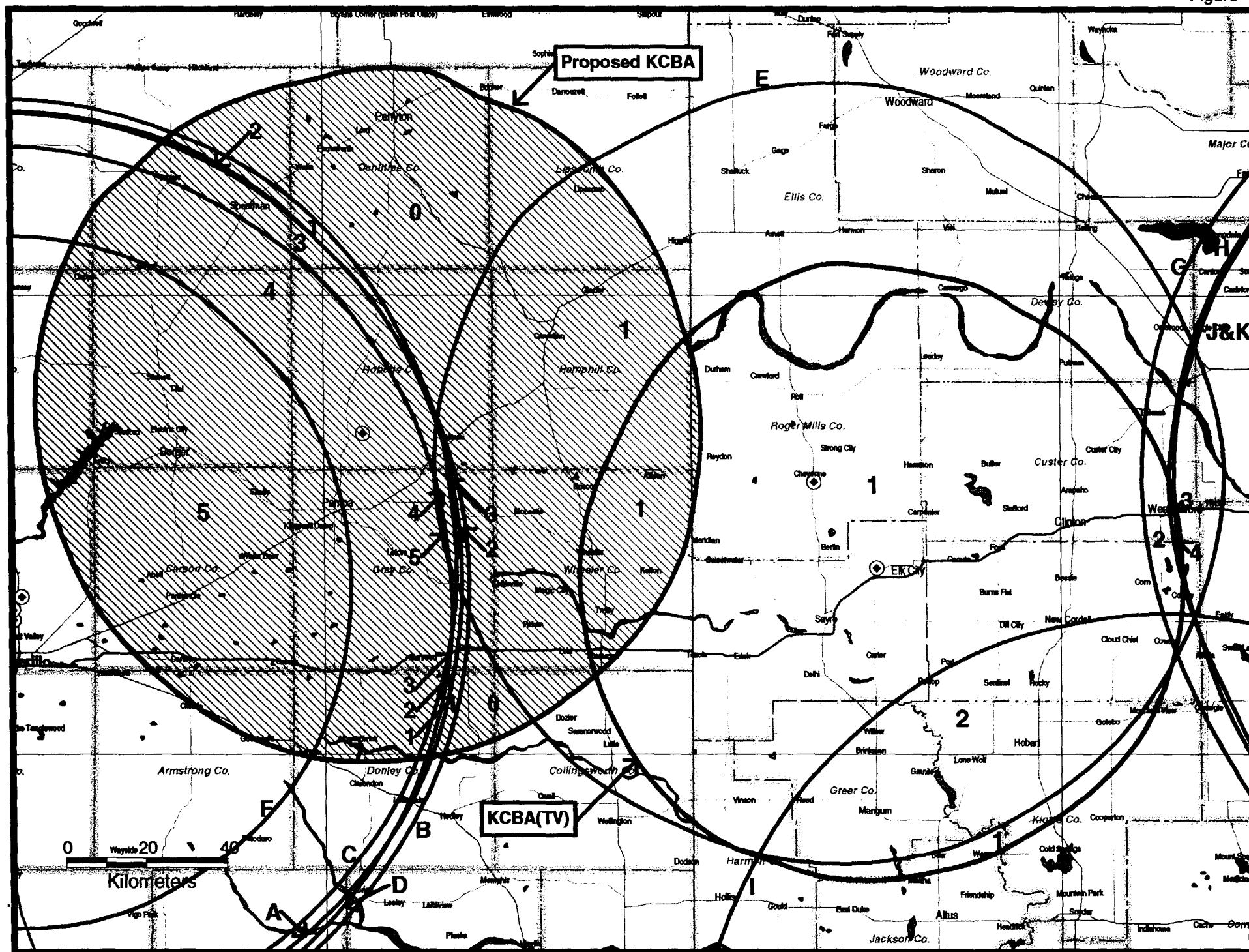


Figure 4



TECHNICAL EXHIBIT
IN SUPPORT OF A PETITION FOR RULE MAKING TO AMEND THE
TV TABLE OF ALLOTMENTS
ELK CITY, OKLAHOMA AND BORGER, TEXAS

OTHER TV STATIONS PROVIDING SERVICE TO GAIN AREA

Map ID	Call Letters	Location	Authorized Facilities
A	KACV-TV	Amarillo, TX	Ch. 2, 100 kW/401 m
B	KAMR-TV	Amarillo, TX	Ch. 4, 100 kW/433 m
C	KVII-TV	Amarillo, TX	Ch. 7, 316 kW/518 m
D	KFDA-TV	Amarillo, TX	Ch. 10, 316 kW/466 m
E	KWET (TV)	Cheyenne, OK	Ch. 12, 316 kW/299 m
F	KCIT (TV)	Amarillo, TX	Ch. 14, 1290 kW/464 m

TECHNICAL EXHIBIT
IN SUPPORT OF A PETITION FOR RULE MAKING TO AMEND THE
TV TABLE OF ALLOTMENTS
ELK CITY, OKLAHOMA AND BORGER, TEXAS

OTHER TV STATIONS PROVIDING SERVICE TO LOSS AREA

Call Letters	Location	Authorized Facilities
KFOR-TV	Oklahoma City, OK	CH 4, 100 kW/469 m
KOCO-TV	Oklahoma City, OK	CH 5, 100 kW(DA)/464 m
KSWO-TV	Lawton, OK	CH 7, 316 kW/320 m
KWTV(TV)	Oklahoma City, OK	CH 9, 316 kW/465 m
KWET(TV)	Cheyenne, OK	CH 12, 316 kW/299 m
KETA(TV)	Oklahoma City, OK	CH 13, 316 kW/465 m

TECHNICAL EXHIBIT
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TO AMEND THE NTSC TV TABLE OF ALLOTMENTS
ELK CITY, OKLAHOMA AND BORGER, TEXAS

Tabulation of Areas, Populations and Grade B
Services Within KBCA Authorized and Proposed Grade B Contours

I. Population and Land Area Within Grade B Contours

Area	1990 Census Population	Area (km ²)
Authorized Grade B Ch. 31 Elk City	79,276	17,299
Proposed Grade B Ch. 31 Borger	82,455	21,475

II. Population and Land Area Within Gain and Loss Areas

Area	1990 Census Population	Area (km ²)
Grade B Gain Area	77,402	20,053
Grade B Loss Area	74,223	15,880
Grade B "Net" Gain Area	3,179	4,176

III. Available Grade B Service Within Grade B Gain and Loss Areas

Area	No. of Grade B Services	Within Grade B Contour	
		1990 Census Population	Area (km ²)
Gain Area	5	51,247	6,511
	4	5,342	4,043
	3	4,901	706
	2	6	145
	1	5,638	4,876
	0	10,268	3,772

Area	No. of Grade B Services	Within Grade B Contour	
		1990 Census Population	Area (km ²)
Loss Area	4	507	10
	3	3,526	22
	2	20,737	3,571
	1	49,453	12,277